

Anthony E. Morris 05cv399***

1. Describe any such communication sought to be protected, including its subject matter; and
2. Identify the individual by whom it was made, the individual to whom it was directed, and all individuals present when it was made; and
3. Identify any document in which it was recorded, described or summarized; and
4. Identify any such document sought to be protected.

INTERROGATORIES¹

- 1) With respect to the equal protection claims in your Complaint, describe in detail how you claim Defendant Taylor racially discriminated against you:
 - (a) Identify all facts that refute, relate to, or support your contention;
 - (b) Identify the specific behavior or conduct that you allege that each Defendant engaged in;
 - (c) Identify all persons with knowledge of such contention or facts;
 - (d) Identify all documents that reflect, refer to or relate to such contention or facts.

RESPONSE: I agree to all the allegation of the equal protection claims.

- 2) With respect to the equal protection claims in your Complaint, describe in detail how you claim Defendant Kearney racially discriminated against you:
 - (a) Identify all facts that refute, relate to, or support your contention;

¹ Please submit additional pages, if necessary.

(b) Identify the specific behavior or conduct that you allege that each Defendant engaged in;

(c) Identify all persons with knowledge of such contention or facts;

(d) Identify all documents that reflect, refer to or relate to such contention or facts.

RESPONSE: A) I agree to all the facts listed in the complaint the equal protection claim.

B) Defend Kearney failed to investigate, correct or implement any policies or procedures to assure inmates at SCI Meigs Building are not being discriminated by their race, Kearney failed to act on appeal and grievance from inmates.

3) Identify (a) every communication you have had with anyone, other than your attorney, concerning this litigation including but not limited to memoranda, journals, diaries, letters, or petitions that you have written; (b) any person with knowledge of such communication(s); and (c) all documents supporting, evidencing, referring or relating to those communications.

RESPONSE: Inmate George Jackson

4) Identify all documents which you intend to offer into evidence at the trial of this matter.

RESPONSE: Documents provided through discovery will be available. Further discovery is needed.

5) Identify all persons having knowledge of the allegations in the complaint or answer whom you intend to call as witnesses at trial, excluding expert witnesses.

RESPONSE: *At this time there no expert witnesses.*

Inmate George Jackson

6) Identify any physical evidence which relates in any way to any of the facts alleged in the complaint or answer, or which you intend to offer in evidence at trial.

RESPONSE: *None*

7) Identify each expert you expect to call to testify as a witness at trial and state for each such expert (a) the qualifications of the expert; (b) the subject matter on which the expert is expected to testify; (c) the substance of the facts and opinions to which the expert is expected to testify; and (d) the summary of the grounds for such opinion.

RESPONSE: *No expert needed*

8) State the following about yourself:

a. Full name, and any other names you have gone by or used,

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11) Identify all programs you have completed during your periods of incarceration over the last fifteen years, and state for each program (a) the name of the program; (b) the purpose of the program; (c) the time period during which you participated in the program; and (d) whether you successfully completed the program.

RESPONSE: *Objection. This Request has no relevance to Plaintiff claim. Rule 26*

12) Identify all physicians you have seen or been treated by in the past 10 years, including name, office address, telephone number, dates of examination or treatment, and the medical problem involved, if any. *Objection. This Request has no relevance*

RESPONSE: *to Plaintiff claim. Rule 26*

13) Identify and describe all accidents, injuries and ailments you have had in the past 15 years, including the history of any mental illness.

RESPONSE: *Objection. This Request has no relevance to Plaintiff claim. Rule 26*

14) Identify in detail the precise injury or harm you allege was sustained as a result of the allegations in the Complaint. *Mental Anguish*

diagnosed medical condition, including but not limited to any mental, emotional, psychiatric, or psychological condition. If your answer is yes, please state the requesting medical doctor, the type of testing, as well as the date and location of said testing.

RESPONSE: *Objection. This request has no relevance to Plaintiff claim. Rule 26*

18) State the total amount of compensatory damages you are claiming and the computation used to arrive at the sum.

RESPONSE: *Refer - To complaint*

19) Have you, or anyone acting on your behalf, obtained from any person any statement, declaration, petition, or affidavit concerning this action or its subject matter? If so, state:

- a. The name and last known address of each such person; and
- b. When, where, by whom and to whom each statement was made, and whether it was reduced to writing or otherwise recorded.

RESPONSE: *None at this time, will ~~submit~~ supplemental Response*

20) Identify all persons who provided information for all or any part of your answers to these Interrogatory Requests and the Request for Production filed contemporaneously herewith and, for each person named, identify the request as to which each such person provided information.

RESPONSE: *No one*

**DEPARTMENT OF JUSTICE
STATE OF DELAWARE**

~~/s/ Stacey Xarhoulakos
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4-3-07

Date

Anthony Morris

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